

EXHIBIT 2

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 JAY J. RALSTON, On Behalf of Himself)
6 and All Others Similarly Situated,)

7 Plaintiff,)

8 vs.)

Case No.:

CV 08-00536 JF

9 MORTGAGE INVESTORS GROUP, INC.,)
10 MORTGAGE INVESTORS GROUP, a general)
partnership, COUNTRYWIDE HOME LOANS,)
INC., and DOES 3-10,)

11 Defendants.)
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15 Deposition of NADER AKHAVAN, taken on
16 behalf of Defendant Mortgage Investors Group,
17 Inc., at 2040 Main Street, Suite 250, Irvine,
18 California, beginning at 10:05 a.m., Thursday,
19 August 18, 2011, before Brooke Silvas,
20 Certified Shorthand Reporter No. 10988, RPR.
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1 APPEARANCES OF COUNSEL:

2

3 For the Plaintiff:

4 SEEGER WEISS LLP
5 BY: JONATHAN SHUB, ESQ.
6 1515 Market Street
7 Suite 1380
8 Philadelphia, Pennsylvania 19102
9 (215) 564-2300
10 jshub@seegerweiss.com

11 For the Defendants Mortgage Investors Group,
12 Inc., and Mortgage Investors Group, a general
13 partnership:

14 PALMER, LOMBARDI & DONOHUE, LLP
15 BY: ROLAND P. REYNOLDS, ESQ.
16 515 South Flower Street
17 Suite 2100
18 Los Angeles, California 90071
19 (213) 688-0430
20 rreynolds@pldlawyers.com

21 For the Defendants Countrywide Home Loans, Inc.:

22 GOODWIN PROCTER
23 BY: ROBERT B. BADER, ESQ.
24 Three Embarcadero Center
25 Suite 2400
San Francisco, California 94111
(415) 733-6000
rbader@goodwinprocter.com

I N D E X

WITNESS

NADER AKHAVAN

EXAMINATION BY:	PAGE:
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E X H I B I T S

DEFENDANT'S	PAGE:
1 Notice of Issuance of Civil Subpoena to Nader Akhavan; Subpoena to Testify at a Deposition in a Civil Action	52

INSTRUCTION NOT TO ANSWER

(None)

INFORMATION TO BE SUPPLIED

(None)

1 IRVINE, CALIFORNIA, THURSDAY, AUGUST 18, 2011

2 10:05 A.M.

3
4 (The oath was administered to the
5 deponent, NADER AKHAVAN, as follows:)

6
7 DEPOSITION OFFICER: Do you solemnly swear that
8 the testimony you will give shall be the truth, the
9 whole truth, and nothing but the truth, so help you
10 God?

11 THE WITNESS: I do.

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13 EXAMINATION

14 BY MR. REYNOLDS:

15 Q Good morning. My name is Roland Reynolds.
16 And I'm the attorney for one of the defendants in
17 this lawsuit, Mortgage Investors Group, Inc. and
18 Mortgage Investors Group, a general partnership.
19 And I'll probably refer to them collectively as
20 Mortgage Investors Group or MIG in this deposition.

21 Will you please state your name and spell
22 your last name for the record.

23 A My name is Nader Akhavan, A-k-h-a-v-a-n.

24 Q Mr. Akhavan, have you had your deposition
25 taken before?

1 Q Okay. And so because of that, your desire
2 to have repeat customers, did you want them to have
3 a loan that they were satisfied with after the
4 closing of the loan?

5 A Of course. By nature, who would want
6 someone to have something that they did not want?

7 Q Right.

8 A It's just --

9 Q Right. Did some borrowers who called in
10 tell you that they wanted a payment option ARM loan?

11 A I don't remember.

12 MR. SHUB: Objection. Calls for speculation.

13 BY MR. REYNOLDS:

14 Q Okay. If you had a payment option ARM
15 loan -- if a borrower -- if you were putting a
16 borrower into a payment option ARM loan, did you
17 always explain to them that -- if it had a negative
18 amortization figure -- term -- possibility, did you
19 always explain the negative amortization feature to
20 the borrower?

21 A Definitely.

22 Q And did you explain the costs of, say, the
23 payment option loan to the borrower compared to the
24 cost of other types of loans?

25 A What do you mean by "cost"?

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2
3 I have read the foregoing deposition
4 transcript and by signing hereafter, approve same.
5

6 Dated _____.

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8 _____
9 (Signature of Deponent)
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